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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

WAG ACQUISITION, L.L.C.,

Plaintiff,

v.

DATA CONVERSIONS, INC., et al.,

Defendants.

C.A. No. 3:19-cv-00489 (MMD) (CBC)

*Document filed with the Clerk of Court*

**NOTICE, STIPULATION  
& ORDER PERMITTING  
WITHDRAWAL OF COUNSEL**

**TO:** Hon. Miranda M. Du, C.U.S.D.J.  
United States District Court for the District Nevada  
Lloyd G. George Courthouse  
333 Las Vegas Blvd. South  
Las Vegas, Nevada 89101

Clerk of Court  
United States District Court for the District Nevada  
Lloyd G. George Courthouse  
333 Las Vegas Blvd. South  
Las Vegas, Nevada 89101

**YOUR HONOR:**

**PLEASE TAKE NOTICE** that Michael J. Gesualdo, Esq., of Robinson Miller LLC, hereby requests that he be permitted to withdraw as counsel for

Defendants WMM, LLC and WMM Holdings, LLC (collectively, "Defendants").

**PLEASE TAKE FURTHER NOTICE** that Mr. Gesualdo served as local counsel for Defendants while this matter was being litigated in the United States District Court for the District of New Jersey.

**PLEASE TAKE FURTHER NOTICE** that upon transfer to the United States District Court for the District of Nevada, Mr. Gesualdo is no longer representing the Defendants. Defendants, however, continue to be represented by lead counsel Venable LLP and have retained local counsel in Marquis Aurbach Coffing. Therefore, no prejudice will result if the Court were to grant Mr. Gesualdo's application.

**PLEASE TAKE FURTHER NOTICE** that Mr. Gesualdo has conferred with counsel for both Plaintiff and Defendants who consent to this application, evidenced by their below signatures.

**PLEASE TAKE FURTHER NOTICE** that Mr. Gesualdo requests that he be removed from receiving further notifications of electronic filings.

For the foregoing reasons, I respectfully request that the Court grant the instant request to withdraw as counsel.

AGREED AND CONSENTED TO BY:

ROBINSON MILLER LLC

By: Michael J. Gesualdo  
Michael J. Gesualdo, Esq.

FENNEMORE CRAIG, P.C.

By: s/ Alex G. Patchen  
Allen J. Wilt, Esq. (SBN 4798)

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*Attorney Requesting Withdrawal*

Elizabeth J. Bassett, Esq. (SBN  
9013)  
300 E. Second St., Suite 1510  
Reno, Nevada 89501

and

LISTON ABRAMSON LLP  
*Admitted Pro Hac Vice*  
David G. Liston, Esq.  
Ronald Abramson, Esq.  
Alex G. Patchen, Esq.  
Ari J. Jaffess, Esq.  
Mord M. Lewis, Esq.  
405 Lexington Ave., 46th Floor  
New York, NY 10174

*Attorneys for Plaintiff WAG  
Acquisition, L.L.C.*

MARQUIS AURBACH COFFING

By: s/ Ralph A. Dengler  
Liane K. Wakayama, Esq.  
10001 Park Run Drive  
Las Vegas, Nevada 89145  
Telephone No.: (702) 382-0711

Ralph A. Dengler, Esq. (*pro hac vice  
to be filed*)  
VENABLE LLP  
New York Bar No. 2796712  
1270 Avenue of the Americas, 24<sup>th</sup> Fl.  
New York, NY 10020  
Telephone No.: (212) 503-0655

*Attorneys for WMM, LLC and  
WMM Holdings, LLC*

IT IS SO ORDERED

  
U.S. MAGISTRATE JUDGE

DATED: 12/30/2019

**SO ORDERED.**

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**Hon. Miranda M. Du, C.U.S.D.J.**



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December 19, 2019

**VIA FEDEX**

Clerk of Court  
United States District Court  
District of Nevada  
Lloyd D. George Courthouse  
333 Las Vegas Blvd. South  
Las Vegas, NV 89101

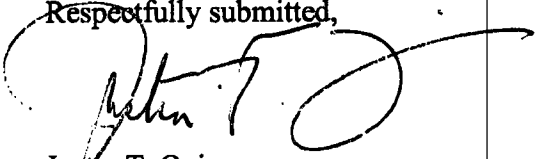
**Re: *WAG Acquisition, L.L.C. v. Data Conversions, Inc. et al.*,  
Civil Action No. 3:19-cv-00489 (MMD) (CBC)**

Dear Sir or Madam:

This Firm was local counsel for Defendants in the above-captioned matter while the case was being litigated in the District of New Jersey. This local counsel representation was terminated upon transfer to this forum. To that end, enclosed for filing are Notices, Stipulations & Orders requesting that Justin T. Quinn, Keith J. Miller, and Michael J. Gesualdo be permitted to withdraw as counsel and cease receiving notices of electronic filings.

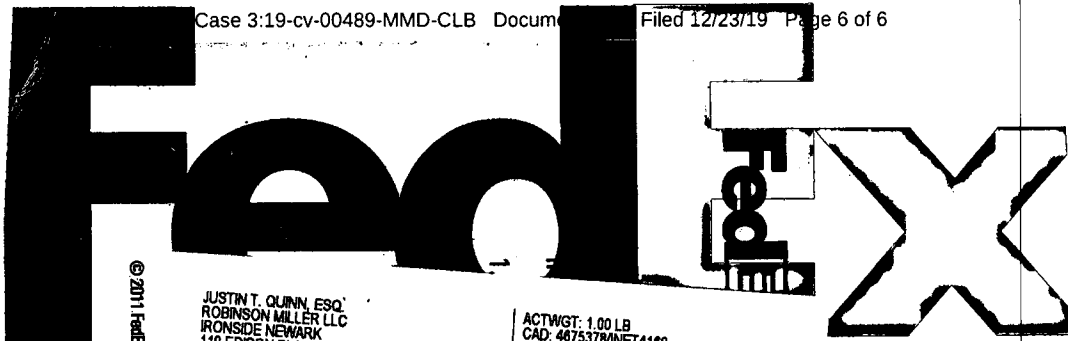
We thank the Court for its consideration of this submission. I am available at the Court's convenience should there be any questions.

Respectfully submitted,



Justin T. Quinn

cc: All counsel of record (via E-MAIL & ECF)



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JUSTIN T. QUINN, ESQ.  
ROBINSON MILLER LLC  
IRONSIDE NEWARK  
110 EDISON PLACE SUITE 302  
NEWARK, NJ 07102  
UNITED STATES US

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(973) 690-5400

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